

ESTTA Tracking number: **ESTTA596625**

Filing date: **04/04/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92056611
Party	Defendant World Wrestling Entertainment, Inc.
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Date	04/04/2014
Attachments	Answer_to_NXT_Rookie_Petition_to_Cancel.pdf(10605 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

EVERGREEN MEDIA HOLDINGS, LLC)	
)	
Petitioner,)	
)	
v.)	Cancellation No. 92/056,611
)	
WORLD WRESTLING)	
ENTERTAINMENT, INC.,)	
)	
Registrant.)	
)	

REGISTRANT’S ANSWER TO PETITION TO CANCEL

Registrant, World Wrestling Entertainment, Inc. (“Registrant” or “WWE”), by its undersigned counsel, hereby answers the allegations set forth in the Petition to Cancel (the “Cancellation”) filed by Petitioner Evergreen Media Holdings, LLC (“Petitioner”) as follows:

1. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 1 of the Cancellation and, for that reason, denies them.

2. Registrant admits that the online records of the United States Patent and Trademark Office show that Petitioner filed applications to register the marks THE ROOKIE and THE ROOKIE (stylized), that the applications, Serial Nos. 85/616,187 and 85/616,194, respectively, were refused by the Patent and Trademark Office under Section 2(d) of the Trademark Act, based on WWE’s NXT ROOKIE registration, Registration No. 3,945,854, and that Registration No. 3,945,854 claims a date of first use of February 23, 2010.

3. Registrant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 3 of the Cancellation and, for that reason, denies them.

4. Denied.

AFFIRMATIVE DEFENSES

In further answer to the Cancellation, Registrant asserts that:

1. Petitioner has failed to state a claim, in whole or in part, upon which relief may be granted.
2. Petitioner has failed to state proper grounds for cancellation.
3. Petitioner has failed to allege facts sufficient to establish priority of use.
4. Petitioner has failed to allege facts sufficient to establish a likelihood of confusion, mistake or deception between Petitioner's applied-for marks and Registrant's mark.
5. Petitioner has not and will not be damaged in any way by the registration of Registrant's mark.

WHEREFORE, Registrant respectfully requests that the Cancellation be dismissed in its entirety and that Registrant be granted such additional relief as the Trademark Trial and Appeal Board may find to be warranted under the circumstances.

Date: April 4, 2014

Respectfully submitted,

/s/ Christopher M. Verdini
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CERTIFICATE OF SERVICE

The undersigned herby certifies that a true and correct copy of the foregoing was served this 4th day of April 2014, via first class mail, postage prepaid, upon the following counsel of record:

Laura Goldbard George
Stroock & Stroock & Lavan LLP
180 Maiden Lane
New York, New York 10038

/s/ Christopher M. Verdini